

FILED

DEC 17 2003

MICHAEL W. DOBBINS UNITED STATES DISTRICT COURT CLERK, U.S. DISTRICT COURT EASTERN DIVISION
JUDGE SIDNEY I. SCHENKIER
JUDGE RONALD GUZMAN
03 CR 1188

UNITED STATES OF AMERICA

v.

DEBORAH HOOKER and
DENNIS HOOKER

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

No.

Sections: Title 18, United
States Code, Sections 513(a),
1341, 2314, and 2.

COUNT ONE

The SPECIAL SEPTEMBER 2002 GRAND JURY charges

1. At times material to this indictment:

a. CDI Network, Inc., and Computer Documents, Inc. (referred to jointly hereinafter as "CDI") were Illinois corporations, each of which had its principal place of business at 240 Fenc1 Lane, Hillside, Illinois.

b. CDI maintained checking accounts at two financial institutions, the Truman Bank, in St. Louis, Missouri, and Merrill Lynch/Bank One, in Columbus, Ohio (collectively, the "CDI Accounts"). The President and Secretary of CDI were the only authorized signatories on the CDI Accounts.

c. Defendant DEBORAH HOOKER, a resident of Schaumburg, Illinois, was employed by CDI as a bookkeeper. Among her duties, defendant DEBORAH HOOKER was responsible for payment of CDI's bills, and for truthfully and accurately maintaining financial books and records of the company.

d. Defendant DENNIS HOOKER, a resident of Schaumburg, Illinois, was the husband of defendant DEBORAH HOOKER.

e. Individual A, a resident of the state of Kentucky, maintained bank accounts at Brownsville Deposit Bank, Brownsville, Kentucky, and Bank of Edmonson County, Brownsville, Kentucky.

2. Between on or about July 2, 1997, and on or about November 7, 2001, at Hillside, in the Northern District of Illinois, Eastern Division, and elsewhere,

DEBORAH HOOKER,

defendant herein, knowingly devised, intended to devise, and participated in a scheme to defraud, and to obtain money and property from CDI by materially false and fraudulent pretenses and representations.

3. It was part of the scheme that defendant DEBORAH HOOKER stole funds from CDI by issuing checks drawn against the CDI Accounts totaling approximately \$1,600,000 by forging the signatures of the President and Secretary of CDI (referred to hereinafter as the "Forged Checks"). Defendant thereafter negotiated, and caused others to negotiate, the Forged Checks, resulting in losses to CDI of approximately \$1,600,000.

4. It was further part of the scheme that defendant DEBORAH HOOKER issued Forged Checks payable to herself in amounts totaling approximately \$200,000, and thereafter caused the checks to be deposited into bank accounts maintained by her and Dennis Hooker at Harris Bank Roselle in Roselle, Illinois.

5. It was further part of the scheme that defendant DEBORAH HOOKER issued Forged Checks payable to Citibank in amounts totaling approximately \$120,000, and thereafter caused the checks to be transported in interstate commerce to pay Citibank credit card account balances owed by her and Dennis Hooker.

6. It was further part of the scheme that defendant DEBORAH HOOKER issued Forged Checks payable to MBNA America in amounts totaling approximately \$46,000, and thereafter caused the checks to be transported in interstate commerce to pay MBNA America credit card account balances owed by her and Dennis Hooker.

7. It was further part of the scheme that defendant DEBORAH HOOKER used Forged Checks totaling approximately \$300,000 to pay additional credit card bills, to purchase luxury boats, a SeaDoo, automobiles, a Harley Davidson motorcycle, to remodel her residence, and to travel.

8. It was further part of the scheme that defendant DEBORAH HOOKER issued Forged Checks payable to Individual A in amounts totaling in excess of \$900,000, and caused those Forged Checks to be transported in interstate commerce to Individual A in Kentucky.

9. It was further part of the scheme that after he received Forged Checks from defendant DEBORAH HOOKER, Individual A caused them to be negotiated for cash or caused them to be deposited into bank accounts maintained by Individual A at Brownsville Deposit

Bank, Brownsville, Kentucky, and Bank of Edmonson County, Brownsville, Kentucky.

10. It was further part of the scheme that after receiving Forged Checks from defendant DEBORAH HOOKER and negotiating or depositing them, defendant DEBORAH HOOKER caused Individual A to return approximately \$170,000 of the proceeds, in cash and checks payable to defendant DEBORAH HOOKER, to defendant DEBORAH HOOKER in Illinois.

11. It was further part of the scheme that defendant DEBORAH HOOKER caused Forged Checks and stolen funds to be transported in interstate commerce by shipping them via FedEx and United Parcel Service.

12. It was further part of the scheme that defendant DEBORAH HOOKER created false financial ledgers for CDI in order to disguise her on-going theft of CDI's funds.

13. It was further part of the scheme that defendant DEBORAH HOOKER hid and destroyed bank statements and other records pertaining to the CDI Accounts and CDI's financial affairs.

14. It was further part of the scheme that defendant DEBORAH HOOKER and her husband Dennis Hooker made false statements regarding their assets and income to creditors and to the principals and employees of CDI in order to disguise the true source of funds stolen from CDI.

15. As a result of the scheme, defendant DEBORAH HOOKER caused CDI to suffer losses of approximately \$1,600,000, and fraudulently converted those funds to her own use and to the use of others.

16. The above-described scheme affected a financial institution, specifically Truman Bank, St. Louis, Missouri, by causing unauthorized, forged checks written against the Truman Bank account of CDI to be negotiated by various banks, businesses, and individuals.

17. It was further part of the scheme that defendants DEBORAH HOOKER concealed, misrepresented, and hid and caused to be concealed, misrepresented, and hidden, the existence and purpose of the scheme and the acts done in furtherance of the scheme.

18. On or about September 18, 1998, at Hillside, in the Northern District of Illinois, Eastern Division,

DEBORAH HOOKER,

defendant herein, for the purpose of executing the aforesaid scheme to defraud, and attempting to do so, knowingly caused to be sent and delivered by an interstate commercial carrier, namely FedEx, according to the directions thereon, a package from Individual A addressed to Debbie Hooker, CDI Network, Inc., 240 Fenc1 Lane, Hillside, Illinois, 60162, which package contained a check payable to Debbie Hooker, in the amount of \$11,000;

In violation of Title 18, United States Code, Sections 1341.

COUNT TWO

The SPECIAL SEPTEMBER 2002 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations in paragraphs 1 through 17 of Count One of this indictment.

2. On or about January 26, 1999, at Hillside, in the Northern District of Illinois, Eastern Division,

DEBORAH HOOKER,

defendant herein, for the purpose of executing the aforesaid scheme to defraud, and attempting to do so, knowingly caused to be sent and delivered by an interstate commercial carrier, namely FedEx, according to the directions thereon, a package addressed to Payments, Citibank, 8725 W. Sierra Avenue, Las Vegas, NV 89117, which package contained a forged CDI check made payable to Citibank, in the amount of \$3,131.19;

In violation of Title 18, United States Code, Sections 1341.

COUNT THREE

The SPECIAL SEPTEMBER 2002 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations in paragraphs 1 through 17 of Count One of this indictment.

2. On or about July 7, 1999, at Hillside, in the Northern District of Illinois, Eastern Division,

DEBORAH HOOKER,

defendant herein, for the purpose of executing the aforesaid scheme to defraud, and attempting to do so, knowingly caused to be sent and delivered by an interstate commercial carrier, namely FedEx, according to the directions thereon, a package addressed to Individual A, Meredith Photography, 3122 US 31 W Bypass, Bowling Green, Kentucky, 42101, which package contained a forged CDI check made payable to Individual, in the amount of \$38,000;

In violation of Title 18, United States Code, Sections 1341.

COUNT FOUR

The SPECIAL SEPTEMBER 2002 GRAND JURY further charges:

1. The Grand Jury realleges and incorporates by reference the allegations in paragraphs 1 through 16 of Count One of this indictment.

2. On or about August 9, 2001, at Hillside, in the Northern District of Illinois, Eastern Division, and elsewhere,

DEBORAH HOOKER,

defendant herein, for the purpose of executing the aforesaid scheme to defraud, and attempting to do so, knowingly caused to be sent and delivered by an interstate commercial carrier, namely FedEx, according to the directions thereon, a package addressed to Payments, Citibank, 8725 West Sahara Avenue, Las Vegas, NV 89117, which package contained a forged CDI check payable to Citibank in the amount of \$3,533.68;

In violation of Title 18, United States Code, Sections 1341.

COUNT FIVE

The SPECIAL SEPTEMBER 2002 GRAND JURY further charges:

On or about June 21, 2000, at Hillside, in the Northern District of Illinois, Eastern Division, and elsewhere,

DEBORAH HOOKER,

defendant herein, did transport and cause to be transported in interstate commerce, from Hillside, Illinois, to Kentucky, a security and money, that is, a forged CDI check in the amount of \$65,137.50 payable to Individual A, written on the Truman Bank account of CDI Network, Inc., knowing that said check had been stolen and taken by fraud;

In violation of Title 18, United States Code, Sections 2314.

COUNT SIX

The SPECIAL SEPTEMBER 2002 GRAND JURY further charges:

On or about January 10, 2001, at Hillside, in the Northern District of Illinois, Eastern Division, and elsewhere,

DEBORAH HOOKER,

defendant herein, did transport and cause to be transported in interstate commerce, from Hillside, Illinois, to Kentucky, securities and money, that is, four forged CDI checks in amounts totaling \$70,000 payable to Individual A, written on the CDI Accounts, knowing that said checks had been stolen and taken by fraud;

In violation of Title 18, United States Code, Sections 2314.

COUNT SEVEN

The SPECIAL SEPTEMBER 2002 GRAND JURY further charges:

On or about July 28, 2000, at Hillside, in the Northern District of Illinois, Eastern Division, and elsewhere,

DEBORAH HOOKER and
DENNIS HOOKER,

defendants herein, did transport and cause to be transported in interstate commerce from Hillside, Illinois, to Kenosha, Wisconsin, securities and money, namely a forged CDI drawn on the Merrill Lynch/Bank One account of Computer Documents, Inc., and a forged CDI check drawn on the Truman Bank account of CDI Network, Inc., each check payable to Captain Jim's Inc. in the amount of \$75,000.00, knowing that said checks had been stolen, converted, and taken by fraud;

In violation of Title 18, United States Code, Sections 2314 and 2.

COUNT EIGHT

The SPECIAL SEPTEMBER 2002 GRAND JURY further charges:

On or about October 19, 2001, at Hillside, in the Northern District of Illinois, Eastern Division, and elsewhere,

DEBORAH HOOKER,
and DENNIS HOOKER,

defendants herein, did transport and cause to be transported in interstate commerce, from Hillside, Illinois, to The Lakes, Nevada, a security and money, that is, a forged CDI check in the amount of \$6,567.72 payable to Citibank, written on the Merrill Lynch/Bank One account of Computer Documents, Inc., knowing that said check had been stolen, converted, and taken by fraud;

In violation of Title 18, United States Code, Sections 2314.

COUNT NINE

The SPECIAL SEPTEMBER 2002 GRAND JURY further charges:

On or about October 22, 2001, at Hillside, in the Northern District of Illinois, Eastern Division, and elsewhere,

DEBORAH HOOKER and
DENNIS HOOKER,

defendants herein, did transport and cause to be transported in interstate commerce, from Hillside, Illinois, to Wilmington, Delaware, a security and money, that is, a forged CDI check in the amount of \$11,044.02 payable to MBNA America, written on the Merrill Lynch/Bank One account of Computer Documents, Inc., knowing that said check had been stolen, converted, and taken by fraud;

In violation of Title 18, United States Code, Sections 2314 and 2.

COUNT TEN

The SPECIAL SEPTEMBER 2002 GRAND JURY further charges:

On or about April 6, 2000, at Elgin, in the Northern District of Illinois, Eastern Division, and elsewhere,

DEBORAH HOOKER and
DENNIS HOOKER,

defendants herein, with intent to deceive another, possessed and uttered a forged security of an organization, namely check number 1477 made payable to Ron Hopkins Ford in the amount of \$22,000.00, drawn on a Truman Bank account in the name of CDI Network, Inc., legal entities which operated in and the activities of which affected interstate commerce, with intent to deceive Truman Bank and CDI Network, Inc.;

In violation of Title 18, United States Code, Sections 513(a) and 2.

COUNT ELEVEN

The SPECIAL SEPTEMBER 2002 GRAND JURY further charges:


On or about July 20, 2001, at Roselle, in the Northern District of Illinois, Eastern Division, and elsewhere,


DEBORAH HOOKER and
DENNIS HOOKER,

defendants herein, with intent to deceive another, possessed and uttered a forged security of an organization, namely check number 1745 made payable to Central Auto Body in the amount of \$11,000.00, drawn on a Truman Bank account in the name of CDI Network, Inc., legal entities which operated in and the activities of which affected interstate commerce, with intent to deceive Truman Bank and CDI Network, Inc.;

In violation of Title 18, United States Code, Sections 513(a) and 2.

A TRUE BILL:


FOREPERSON


UNITED STATES ATTORNEY

No.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

VS.

DEBORAH HOOKER & DENNIS HOOKER

INDICTMENT

in violation of: Title 18, United States Code, Section
513(a), 1341, 2314, and 2

A true bill,

[Signature]

Foreman

Filed in open court this _____ day

of DEC 17 2003, A.D. _____

MICHAEL W. DOBHINS
Clerk

Bail, \$ _____

[Signature] Deputy Clerk

RECEIVED

DEC 17 2003

MAGISTRATE JUDGE IAN H. LEVIN
UNITED STATES DISTRICT COURT

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MAGISTRATE JUDGE IAN H. LEVIN
UNITED STATES DISTRICT COURT